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Attorneys for Third-Party Defendants

Kimberly Johnson &

R and K Vancouver Investments, LLC

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

PORTLAND DIVISION

REZA MOTAMENI, an individual,

Plaintiff,

v.

MELISSA ADAMS, an individual formerly
known as Melissa Motameni,

Defendant.

and

MOTO-BIZ, INC., an Oregon corporation,

Nominal Defendant

Case No. 3:21-cv-01184-HZ

**THIRD-PARTY DEFENDANTS’
UNOPPOSED MOTION FOR
EXTENSION OF TIME TO
RESPOND TO THIRD-PARTY
COMPLAINT**

MELISSA ADAMS, individually and derivatively on behalf of MOTO-BIZ, INC., and Oregon corporation, MOJO BIZ, LLC, an Oregon limited liability company, NOOR, LLC, an Oregon limited liability company, and LUCKY STRIKE NW, LLC, and Oregon limited liability company

Counterclaimants and
Third-Party Plaintiffs,

v.

RAY MOTAMENI, an individual,
KIMBERLY JOHNSON, an individual,
and R AND K VANCOUVER
INVESTMENTS, LLC, an Oregon limited
liability company,

Counterclaim Defendants and
Third-Party Defendants.

CERTIFICATE OF COMPLIANCE WITH LR 7-1

Pursuant to LR 7-1, counsel for Third-Party Defendants Kimberly Johnson and R and K Vancouver Investments, LLC certify that they conferred with Third-Party Plaintiff's counsel, and Third-Party Plaintiff does not oppose this motion.

MOTION

Pursuant to Fed. R. Civ. P. 6(b), Third-Party Defendants Kimberly Johnson and R and K Vancouver Investments, LLC (collectively, "Third-Party Defendants") move the court for an order extending the deadline to April 27, 2022 for Third-Party Defendants to respond to Defendant/Third-Party Plaintiff Melissa Adams's ("Third-Party Plaintiff") Answer, Affirmative Defenses, Counterclaims to Plaintiff's Second Amended Complaint, and Third-Party Complaint. (Dkt No. 32, the "Third-Party Complaint").

Third-Party Plaintiff filed her Third-Party Complaint, first naming the Third-Party Defendants as parties in this action, on March 8, 2022. (Dkt. No. 32). Third-Party Defendants' response to Third-Party Plaintiff's Answer is currently due on April 11, 2022. (*See* Dkt. No. 39). Due to Third-Party Defendants only recently having obtained counsel, Third-Party Defendants respectfully ask the Court to extend that deadline to April 27, 2022. This is Third-Party Defendants' first motion for an extension of time. Third-Party Defendants seek this extension to give them sufficient time to address the factual and legal issues presented by Third-Party Plaintiff's Complaint, and the requested extension will not unreasonably delay this case.

Third-Party Plaintiff's counsel indicates that she does not oppose an extension of time.

CONCLUSION

For the aforementioned reasons, Third-Party Defendants respectfully request an extension to April 27, 2022 to file their response to Third-Party Plaintiff's Complaint.

Dated: April 11, 2022

Respectfully submitted,

HOLLAND & KNIGHT LLP

By: s/ Shannon Armstrong

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*Attorneys for Third-Party Defendants
Kimberly Johnson & R and K Vancouver
Investments, LLC*

CERTIFICATE OF SERVICE

I hereby certify that I caused the foregoing UNOPPOSED MOTION TO EXTEND DEADLINE TO RESPOND to be served on the following person[s]:

Nicholas Henderson nhenderson@portlaw.com

Kristen Price pricek@lanepowell.com; docketing@lanepowell.com; pinkleyl@lanepowell.com

Janet Larsen larsenj@lanepowell.com; docketing-pdx@lanepowell.com; smithc@lanepowell.com

by the following indicated method or methods:

- ☒ by CM/ECF electronically mailed notice from the Court on the date set forth below.
- ☐ by mailing full, true and correct copies thereof in sealed, first class postage prepaid envelopes, addressed to the parties and/or their attorneys as shown above, to the last-known office addresses of the parties and/or attorneys, and deposited with the United States Postal Service at Portland, Oregon, on the date set forth below.
- ☐ by causing full, true, and correct copies thereof to be hand-delivered to the parties and/or their attorneys at their last-known office addresses listed above on the date set forth below.
- ☐ by sending full, true, and correct copies thereof, via overnight courier in sealed, prepaid envelopes, addressed to the parties and/or their attorneys as shown above, to the last-known office addresses of the parties and/or their attorneys, on the date set forth below.
- ☐ by faxing full, true, and correct copies thereof to the fax machines which are the last-known fax numbers for the parties' and/or attorneys' offices, on the date set forth below.

DATED April 11, 2022.

s/ Shannon Armstrong

Shannon Armstrong